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Attorneys for Defendants
 LORI CHIANG, ROBERT CHIANG AND CHIANG
 C.M. CONSTRUCTION

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

SAFECO INSURANCE COMPANY OF
 AMERICA,

Plaintiff,

v.

LORI CHIANG, ROBERT CHIANG, and
 CHIANG C.M. CONSTRUCTION
 COMPANY, INC.,
 Defendants.

CASE NO. C 04-1977 SC

**STIPULATION FOR ADR AND
 CONTINUED CASE MANAGEMENT
 CONFERENCE; ~~PROPOSED~~ ORDER**

Case Management Conference: August 18, 2005
 Time: 10:00 a.m.
 The Honorable Samuel Conti

Plaintiff Safeco Insurance Company of America and Defendants Lori Chiang, Robert Chiang, and Chiang C.M. Construction Company, Inc. previously stipulated to participate in private mediation. The parties herein jointly request that the parties be given an additional 90-day extension to complete mediation and further request that the status conference in this matter scheduled for August 18, 2005 at 10:00 a.m. be continued. The parties request the extension in

1 order to allow the parties to complete discovery in this matter and give the parties an opportunity
 2 to work towards informal resolution of this matter without the need for formal mediation.
 3 Further, the requested extension will permit the parties to further investigate and monitor related
 4 proceedings pending in the Superior Court for the City and County of San Francisco. Counsel
 5 have met and conferred and agree that discovery of information from the related cases is
 6 necessary for determining a portion of the damages sought by Safeco against defendants in this
 7 action and for meaningful participation of all parties in formal mediation. The parties further
 8 agree that the parties can be permitted to file motions for summary judgment during the time that
 9 the case is referred to mediation.

10 DATED: August 11, 2005

SEDGWICK, DETERT, MORAN & ARNOLD LLP

13 By: /s/ Mary C. Richardson

James P. Diwik

Mary Creer Richardson

Attorneys for Plaintiff

SAFECO INSURANCE COMPANY OF
AMERICA

17 SIGNATURE ATTESTATION: I, Mary Creer Richardson, counsel for plaintiff Safeco
 18 Insurance Company of America, attest that concurrence in the filing of this document has been
 obtained by Michele Miller, Esq., counsel for defendants as set forth above.

19 DATED: August 11, 2005

MCKAGUE AND TONG, LLP

22 By: /s/ Michele Miller

Daron D. Tong

Michele Miller

Attorneys for Defendants

LORI CHIANG, ROBERT CHIANG & CHIANG
C.M. CONSTRUCTION

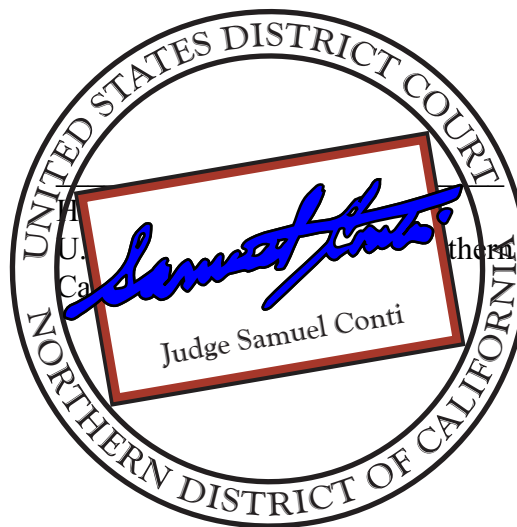
PROPOSED ORDER

The parties shall complete mediation pursuant to the Stipulation.

The status conference in this matter scheduled for August 18, 2005 at 10:00 a.m. is hereby continued to Nov. 18, 2005. The parties are permitted to file motions for summary judgment during the time that the case is referred to mediation.

It is so ordered.

Dated: 8/16/05



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